



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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March 30, 2011

Ms. Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike
Suite A-500
Oak Ridge, TN 37830

SUBJ: EPA Review and Comments on
Final Site-Wide Environmental Impact Statement (SWFEIS)
Y-12 National Security Complex (DOE/EIS-0387) Project,
To Support the Stockpile Stewardship Program and to
Meet the Mission Assigned to Y-12
Oak Ridge, Tennessee
CEQ Number 20110066

Dear Ms. Gorman:

The U.S. Environmental Protection Agency (EPA), pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, reviewed the subject FEIS for the Y-12 National Security Complex on the Oak Ridge Reservation (ORR) in Oak Ridge Tennessee. We appreciate your responses to our comments regarding the Draft Site-Wide EIS (DSWEIS), which were included in Volume II of this FSWEIS.

The FSWEIS evaluates alternatives for proposed new actions and changes subsequent to the 2002 Y-12 EIS ROD, and addresses comments regarding the DSWEIS. The FSWEIS evaluated five alternatives: No action; Uranium Processing Facility (UPF); Upgrade-in-Place; Capability-sized UPF; and no net production/capability-sized UPF.

The Capability-sized UPF (Alternative 4) was identified in the DSWEIS and FSWEIS as the DOE's preferred alternative. This alternative will maintain a basic manufacturing capability to conduct surveillance and to produce and dismantle secondaries (nuclear weapons components) and cases (which contain secondaries and other components). It would also provide for laboratory and experimental capabilities to support the stockpile, including uranium work for other National Nuclear Security Administration (NNSA) and non-NNSA customers. This alternative supports the goal of modernizing and increasing efficiency of the Y-12 facility.

The Complex Command Center (CCC) is also part of the Capability-sized UPF alternative and is included in the other action alternatives. The CCC would consist of a new facility for housing equipment and personnel including plant management, Fire Department, and the Emergency Operations Center (EOC).

The FSWEIS states that construction of the Capability-sized UPF and CCC would require approximately 39 acres; this would take place on previously developed industrialized land at the Oak Ridge facility, including a parking lot. Construction of access roads and road extensions would disturb about 6 acres.

While the Preferred Alternative includes plans for modernization, efficiency and safety improvements, and EPA concurs with these benefits and safety advantages, we also continue to have environmental concerns. Ongoing environmental monitoring and emergency preparedness planning need to continue as the project progresses. In particular, waste management, radiation, air quality, and NPDES discharges are ongoing areas of concern.

There are inherent environmental concerns regarding the storage, transportation and disposal of hazardous waste and radioactive wastes, and the FSWEIS notes the need for continuing radioactive and hazardous materials and waste management, environmental monitoring to prevent ecological impacts, emergency preparedness, and radiological monitoring to ensure safety for workers and the public. We note that one of the goals of the project is to improve worker protection through the use of engineered controls, and through modernization of the Y-12 facilities and technologies.

The FSWEIS states that radiation from normal operations would be below regulatory standards, with no statistically significant impact on the health and safety of workers and the public. Wastes generated from the Y-12 facility include liquid and solid low-level radioactive wastes (LLW), mixed LLW (MLLW), hazardous and nonhazardous wastes. The FSWEIS summarizes DOE's Records of Decision (RODs) that affect the management of LLW, MLLW, and hazardous waste. The DOE decided to treat liquid LLW onsite, while offsite management of solid LLW is preferred (after temporary onsite storage). DOE decided to regionalize treatment of MLLW, which includes the onsite treatment of waste and could include treatment of some MLLW generated at other sites. Commercial and ORR facilities are used for treatment of ORR nonwastewater hazardous waste, and DOE continues to use onsite facilities for wastewater hazardous waste.

The air quality section of the FSWEIS [Section 5.6.1.6 (page 5-33)] states that the general conformity process takes place in nonattainment or maintenance areas. However, the FSWEIS does not state that Y-12 National Security Complex is located in the Knoxville (Anderson County and Blount County) PM_{2.5} and 8-hour ozone nonattainment area.

NPDES discharges from the Y-12 facility require ongoing monitoring, and regular monitoring and storm water characterization is required under the NPDES Permit. We also note that groundwater contamination from past activities requires ongoing monitoring. The FSWEIS states that the preferred alternative is not expected to impact groundwater quality.

Our comments focused on the DOE's Preferred Alternative, the Capability-sized UPF Alternative. Therefore, if a different alternative is ultimately pursued that would result in increased impacts, then additional NEPA evaluation could be expected by EPA.

We appreciate the opportunity to provide these comments, and request that you provide us with a copy of the Record of Decision (ROD) when it becomes available. If you have questions, please coordinate them with Ramona McConney (404/562-9615).

Sincerely,

A handwritten signature in black ink, appearing to read "H. Mueller", with a stylized flourish at the end.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management